



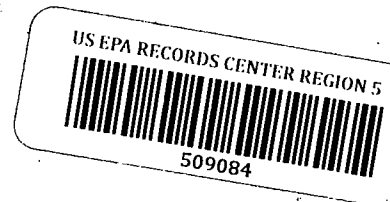
State of Illinois

## ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

1701 First Avenue, Maywood, IL 60153

**DATE:** March 10, 1999  
**TO:** Division File  
**FROM:** Gino Bruni, BOL/FOS - Maywood  
**SUBJECT:** 0316005505 - Cook County  
Cometco Corp.  
Compliance File



The USEPA requested assistance from IEPA for various inspections of Cozzi Iron & Metal, Inc. (Cozzi) facilities in Chicago, Illinois. IEPA's purpose during these inspections was to determine compliance with the Illinois Environmental Protection Act and 35 Ill. Adm. Code, Subtitle G.

Cometco Corp. is a subsidiary of Cozzi. Metal Management, Inc. is the parent company of Cozzi. The following additional Cozzi facilities were inspected by the USEPA and IEPA:

Scrap Processing, Inc.  
9331 S. Ewing St.  
Chicago, Illinois 60617  
Inspected on August 4, 1998

Scrap Processing, Inc.  
3200 E. 96th Street  
Chicago, Illinois 60617  
Inspected on August 4, 1998

City Centre  
350 North Artesian  
Chicago, Illinois 60622  
Inspected on August 5, 1998

At approximately 8:45AM on August 5, 1998 I arrived at Cometco Corp., 1509 West Cortland Street, Chicago, Illinois. The following individuals were present during the inspection: Debra Levin, and Jim Mauer (Cometco Corp. representatives), Mike Powers (TechLaw, Inc. - USEPA Region 5 contractor), Ken Zolnierczk (USEPA/TSCA - Region 5), and myself.

Cometco Corp. receives tin plate, metal trimmings, and miscellaneous scrap metal. These materials are placed on the ground for temporary storage prior to being put into a bailer and the bailed scrap is then transported by truck, barge, or rail to a steel mill.

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The following wastes are generated:

**1) WASTE OIL**

- \* Generated from crane and truck maintenance.
- \* Accumulated in 55 gallon drums located inside the maintenance shop.
- \* Transported by Cozzi to their facility located at 2500 S. Paulina, Chicago, Illinois where the waste is burned in space heaters.

**2) WASTE HYDRAULIC OIL**

- \* Generated from bailer maintenance.
- \* Accumulated in a 600 gallon above ground tank located near the bailer.
- \* Approximately every month Purified Lube, Mokena, Illinois, recycles the waste on-site. The recycled hydraulic oil is reused.

**3) CONTAMINATED OIL DRY**

- \* Generated from oil spills.
- \* Contaminated oil dry was observed around drums of waste oil located in the maintenance shop.
- \* Handled as general refuse.

**5) WHITE MILKY LIQUID (APPEARS TO BE CUTTING/COOLING OIL AND WATER)**

- \* Generated when precipitation comes in contact with miscellaneous scrap metal.
- \* Poned throughout the facility.
- \* This uncontained waste can also flow towards a retention pond located in the southeast corner of the property.

**4) BLACK OILY MATERIAL AND WATER**

- \* Generated when precipitation comes in contact with materials at the site.
- \* Accumulates in a retention pond (approx. 30ft. by 30ft., 6ft deep) located in the southeast corner of the property. The retention pond is apparently regulated under NPDES General Permit NO. ILR002812.
- \* Duke's Oil Service, Inc. pumps out oil and water from the retention pond and transports the waste to Beaver Oil Co. Inc., Hodgkins, Illinois. Approximately one month prior to the USEPA's sampling inspection at the facility, 22,800 gallons of waste oil and water from the retention pond was transported to Beaver Oil Co. Inc. (See the attached receipts).

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The retention pond was installed in the mid to late 1970s by the previous owner. Cometco Corp. has been operating the retention pond since 1982. Information regarding the materials used to construct the retention pond was not available during the inspection.

The surface of the retention pond was black. I observed metal 55 gallon drums and miscellaneous pieces of scrap metal in the retention pond.

A metal pipe approximately 36 inches in diameter was observed in the southeast corner of the pond. Apparently the pipe extends from inside the pond (below the black oily material) to the Chicago River. Mauer said the water in the pond discharges to the Chicago River when the level is high enough. An August 24, 1998 letter from Mark LaRose (Attorney representing Cozzi) stated "Cozzi believes there is periodic discharges of water into the river".

The following apparent violations were observed:

- 1) 12(a) of the Illinois Environmental Protection Act  
Caused, threatened, and allowed water pollution.
- \* White milky liquid was observed ponded throughout the facility.
  - \* Black oil material was observed in the retention pond located in the southeast corner of the property.
- 2) 12(d) of the Illinois Environmental Protection Act  
Created a water pollution hazard.
- \* Black oil material was observed in the retention pond located in the southeast corner of the property.
- 3) 21(a) of the Illinois Environmental Protection Act  
Caused and allowed open dumping.
- \* White milky liquid was observed ponded throughout the facility.
  - \* Black oil material was observed in the retention pond located in the southeast corner of the property.
- 4) 21(p)(1) of the Illinois Environmental Protection Act  
Caused and allowed open dumping of waste in a manner which resulted in litter.
- \* White milky liquid was observed ponded throughout the facility.
  - \* Black oil material was observed in the retention pond located in the southeast corner of the property.

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- 5) 21(p)(4) of the Illinois Environmental Protection Act  
Caused and allowed open dumping of waste in a manner which resulted in deposition of waste in standing water.
- \* Black oil material was observed in the retention pond located in the southeast corner of the property.
- 6) 21(p)(6) of the Illinois Environmental Protection Act  
Caused and allowed open dumping of waste in a manner which resulted in standing liquid discharge.
- \* White milky liquid was observed ponded throughout the facility.
  - \* Black oil material was observed in the retention pond located in the southeast corner of the property.
- 7) 35 Ill. Adm. Code 722.111  
Failed to make a hazardous waste determination for the following wastes: waste hydraulic oil, contaminated oil dry, white milky liquid, and black oily material and water.
- 8) 35 Ill. Adm. Code 808.121(a)  
Failed to make a special waste determination for the following wastes: waste hydraulic oil, contaminated oil dry, white milky liquid, and black oily material and water.
- 9) 35 Ill. Adm. Code 739.111  
Failed to determine if the waste oil meets the specifications shown in Table 1 of this section.